# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: DeAnndra Lechel Burton, Debtor Case No. 22-00255-KMS
CHAPTER 13

### **NOTICE**

Debtor has filed papers with the court to incur new debt.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk U.S. Bankruptcy Court Dan M. Russell, Jr. United States Courthouse 2012 15th St., Ste. 244 Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

Thomas C. Rollins, Jr. The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Incur New Debt.

Date: June 23, 2025 Signature: <u>/s/ Thomas C. Rollins, Jr.</u>

Thomas C. Rollins, Jr. (MSBN 103469)

The Rollins Law Firm, PLLC

P.O Box 13767 Jackson, MS 39236 601-500-5533

trollins@therollinsfirm.com

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: DeAnndra Lechel Burton, Debtor Case No. 22-00255-KMS
CHAPTER 13

### **MOTION TO INCUR NEW DEBT**

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

- 1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on February 10, 2022.
- 2. Debtor is paying approximately 0% to General Unsecured Debts through the plan.
- 3. Debtor does not currently own a vehicle and has been relying on her mother's vehicle to commute to and from work. She is no longer able to use her mother's vehicle and needs to obtain her own.
- 4. A Supplemental Schedule I and J (Dk #67) has been filed evidencing debtor's current income and expenses and demonstrating her ability to make the proposed direct payments for the vehicle loan.
- 5. Debtor wishes to borrow up to \$30,000.00 to purchase a vehicle with an interest rate not to exceed 20.00% and monthly payments not to exceed \$550.00. Debtor will make payments directly to the lender in accordance with the terms of the loan agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

### CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Incur Debt was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4	UNITED STATES BANKRUPTCY COURT
5	SOUTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 22-00255-KMS  DEANNDRA LECHEL BURTON DECLARATION OF MAILING
7	CERTIFICATE OF SERVICE
8	Chapter: 13
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11	On 6/23/2025, I did cause a copy of the following documents, described below,
12	Notice and Motion to Incur New Debt
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18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
21	Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.
23	DATED: 6/23/2025
24	<u>/s/ Thomas C. Rollins, Jr.</u> Thomas C. Rollins, Jr.
25	Attorney at Law The Rollins Law Firm
26	702 W. Pine Street Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
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22-00255-KMS Dkt 69 Filed 06/24/25 Entered 06/24/25 07:57:59 Page 3 of 5

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3	UNITED STATES BANKRUPTCY COURT
4	SOUTHERN DISTRICT OF MISSISSIPPI
5	IN RE:   CASE NO: 22-00255-KMS
6	DEANNDRA LECHEL BURTON  CERTIFICATE OF SERVICE
7	DECLARATION OF MAILING  Chapter: 13
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11	On 6/23/2025, a copy of the following documents, described below,
12	Notice and Motion to Incur New Debt
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19	were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
21	referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.
22	DATED: 6/23/2025
23	
24	Will hall
25	Miles Wood  BK Attorney Services, LLC
26	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.
27	The Rollins Law Firm 702 W. Pine Street
28	Hattiesburg, MS 39401
II	l de la companya de

## 22-00255-KMS Dkt 69 Filed 06/24/25 Entered 06/24/25 07:57:59 Page 5 of 5

USPS FIRST CLASS MAILING RECIPIENTS:
Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 22-00255-KMS SOUTHERN DISTRICT OF MISSISSIPPI MON JUN 23 11-54-21 PST 2025

21ST MORTGAGE CORPORATION CO EDWARD E LAWLER JR POB 2488 RIDGELAND MS 39158-2488 21ST MORTGAGE CORPORATION
MCKAY LAWLER FRANKLIN FOREMAN PLLC
CO EDWARD E LAWLER JR
POST OFFICE BOX 2488
RIDGELAND MS 39158-2488

EXCLUDE

US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201-5036

(P)21ST MORTGAGE CORPORATION PO BOX 477 KNOXVILLE TN 37901-0477

AIDVANTAGE ON BEHALF OF THE DEPARTMENT OF ED DEPT OF ED LOAN SERVICES PO BOX 9635 WILKES-BARRE PA 18773-9635

AMERICAN MORTGAGE LO 3203 LANEY LN BAKER LA 70714-3774

CREDIT ONE BANK PO BOX 98872 LAS VEGAS NV 89193-8872 ENTERGY MISSISSIPPI LLC 4809 JEFFERSON HWY STE A NEW ORLEANS LA 70121-3138

JENNIFER A CURRY CALVILLO
THE ROLLINS LAW FIRM ATTORNEY FOR
DEANNDRA LECHEL BURTON
702 W PINE ST
HATTIESBURG MS 39401-3836

JSUNDSL 1325 JR LYNCH ST JACKSON MS 39217-0001 LVNV FUNDING LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

LOUISIANA RECOVERY SER 1304 BERTRAND DR LAFAYETTE LA 70506-9107 NAVIENT PO BOX 9500 WILKES BARRE PA 18773-9500 NAVIENT PO BOX 9635 WILKES BARRE PA 18773-9635

PLAZA SERVICES LLC PO BOX 1931 BURLINGAME CA 94011-1931 PROFESSIONAL ACCOUNT S PO BOX 68 BRENTWOOD TN 37024-0068 (P)RECEIVABLE RECOVERY SERVICES LLC ATTN ANNA MARTIN
110 VETERANS MEMORIAL BLVD STE 445
METAIRIE LA 70005-4931

SW MS REG CR 212 THIRD STREET MC COMB MS 39648-4102 EXCLUDE
UNITED STATES TRUSTEE
501 EAST COURT STREET

SUITE 6-430 JACKSON MS 39201-5022 EXCLUDE

(P) DAVID RAWLINGS
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE

DEBTOR

DEANNDRA LECHEL BURTON 2150 WHITETOWN RD WOODVILLE MS 39669-4208 JENNIFER A CURRY CALVILLO THE ROLLINS LAW FIRM 702 W PINE ST HATTIESBURG MS 39401-3836 THOMAS CARL ROLLINS JR THE ROLLINS LAW FIRM PLLC PO BOX 13767 JACKSON MS 39236-3767

HATTIESBURG MS 39403-0566